South Coast
Air Quality Management District
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OFFICE OF THE CHAIRMAN
AIR RESOURCES BOARD

Office of the Executive Officer
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November 9, 2010

Mary D. Nichols
Chairman
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

Reference: 2010 Consumer Products Regulatory Amendments

Dear Chairman Nichols,

The South Coast Air Quality Management District (AQMD) staff supports the recent California Air Resources Board (CARB) proposal to amend the California Consumer Product Regulation. AQMD strongly supports any and all appropriate actions that will allow the State Implementation Plan (SIP) commitments to be met and will assist in efforts to achieve clean air for the residents of California.

Specifically, AQMD strongly supports the proposed lower volatile organic compound (VOC) limits for General Purpose Cleaners and General Purpose Degreasers. AQMD believes that these products are technically feasible based on testing conducted to establish the AQMD Clean Air Choices Cleaner Certification Program. In addition, further research indicates that a variety of compliant products are both readily available and represent a large portion of the market. Clearly these low-VOC products are "commercially and technologically feasible" and meet the necessary finding of Health and Safety Code 41712, which also calls for these regulations to achieve the maximum feasible VOC reductions.

Furthermore, AQMD would also like to express support for CARB's approach with respect to the potential increased use of certain toxic low vapor pressure (LVP) solvents. AQMD similarly believes that there are a sufficient number of cost-competitive products on the market that are within the proposed VOC limits and that are not formulated with these solvents. Additionally, the toxic, low vapor pressure solvents in question are more likely to be found in the high-VOC

content consumer product formulations than in the low-VOC alternatives, which are overall being formulated to be environmentally preferable. AQMD staff supports CARB's approach to pursue lower VOC limits, while concurrently reviewing and tracking the use of these LVP solvents as the preferred, prudent course of action.

AQMD encourages CARB to continue to examine limiting the LVP solvent exemptions as a way to further reduce VOC emissions from consumer products. Studies and testing suggest that LVP solvents contribute to ozone formation, as reflected by their Maximum Incremental Reactivity (MIR) values. AQMD believes that substantial additional emission reductions could be realized by limiting the LVP exemption to only solvents that have very low MIRs. Moreover, during the research conducted to establish the AQMD Clean Air Choices Cleaner program, it was determined that most environmentally- preferable cleaning products would meet the proposed standards without relying on LVP solvent exemptions.

AQMD looks forward to working closely with CARB towards attaining our mutual goals of reaching attainment of State and Federal air quality standards and further protecting the health of all Californians.

Sincerely,

Barry R. Wallerstein, D.Env.
Executive Officer

cc: James Goldstene
CARB Members
SCAQMD Board Members